

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TELECOM BUSINESS SOLUTION, LLC,  
LATAM TOWERS, LLC, and AMLQ HOLDINGS  
(CAY) LTD.,

*Petitioners,*

v.

TERRA TOWERS CORP. and TBS  
MANAGEMENT, S.A.,

*Respondents.*

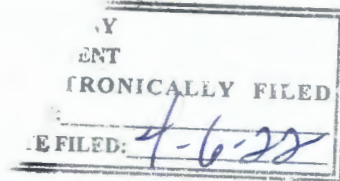
TERRA TOWERS CORP., TBS MANAGEMENT,  
S.A., and DT HOLDINGS, INC.

*Cross-Petitioners,*

v.

TELECOM BUSINESS SOLUTION, LLC,  
LATAM TOWERS, LLC, and AMLQ HOLDINGS  
(CAY) LTD.,

*Cross- Respondents.*



No. 22-cv-1761-LAK

**NOTICE OF MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

PLEASE TAKE NOTICE that upon the accompanying Declaration of George W. Kroup in Support of Motion for Leave to File Exhibits Under Seal, Respondents/Cross-Petitioners Terra Towers Corp., TBS Management, S.A. (together, "Terra"), and DT Holdings, Inc. ("DTH"), by and through undersigned counsel, hereby move this Court, pursuant to Federal Rules of Civil Procedure 5.2(d), for an Order granting leave to file under seal all exhibits attached to the Declaration of George W. Kroup in Opposition to Petition to Confirm and in Support of Petition to Vacate.

SO ORDERED

  
LEWIS A. KAPLAN, USDJ  
4-6-22

Dated: New York, New York  
April 1, 2022

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Holdings, Inc.*